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16
17 **UNITED STATES DISTRICT COURT FOR THE**
18 **NORTHERN DISTRICT OF CALIFORNIA**

19 ALICIA HERNANDEZ et al., individually
20 and on behalf of all others similarly situated,

21 Plaintiffs,

22 v.

23 WELL FARGO BANK, N.A.,

24 Defendant.

25 Case No. 3:18-cv-07354-WHA

26
**DECLARATION OF MARK
RAPAZZINI ON BEHALF OF THE
HEFFLER CLAIMS GROUP, THE
NOTICE ADMINISTRATOR**

27 Date:
28 Time:
Dept: Courtroom 12
Judge: Hon. William H. Alsup

1
2 I, Mark Rapazzini, declare as follows:
3

4 1. I am an attorney, admitted to practice in California in 1983, and a Senior Director at the
5 Heffler Claims Group, ("Heffler") in Philadelphia, Pennsylvania, a company that handles the notice and
6 administration of class actions settlements, claims administration services, collective actions and
7 government enforcement actions. I have worked in the settlement administration business for
8 approximately 18 years. In addition, I was a practicing attorney in the class action and mass torts area
9 from 1983-2008. Information about Heffler and services we provide can be found at the firm's website:
10 www.hefflerclaims.com.

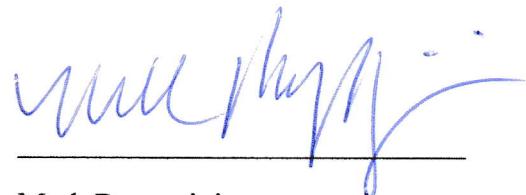
11 2. In mid-February Heffler was engaged by class counsel to mail the Class Certification
12 Notice in this matter. Defense counsel provided Heffler with the class list in this matter on March 15,
13 2020. At that time class counsel informed me that the Class Certification Notice in this case needed to
14 be mailed on March 30, 2020, Heffler foresaw no difficulty mailing the Class Certification Notice by
15 Monday, March 30.

16 3. On March 19, 2020, the Governor of Pennsylvania ordered all Non-Life-Sustaining
17 Businesses to close their physical locations in Pennsylvania as of 8pm, March 19, 2020 to slow the
18 spread of Covid-19. The Governor's Order states that it will remain in effect until further notice. In
19 compliance with the Governor's Order, Heffler closed its offices, and Heffler's employees have been
20 working remotely since March 19, 2020. Heffler has been forced to adjust its operations accordingly.
21 On March 25, 2020 Heffler received an email from the Governor's office stating Heffler can remain
22 open as a Life-Sustaining business, and further directing Heffler to comply with social distancing and
23 other mitigation measures. Specifically, working from home must be the primary work option
24 available, and in-person work at a business site is only to be performed on the most limited basis
25 possible in order to deliver our services. In compliance with the Governor's instructions, Heffler's
26 employees will continue to work remotely, other than Heffler's mailroom employees who will be on
27 site in Heffler's offices on Thursdays only. This mitigates our mailroom employees' possible exposure
28 to Covid-19, by limiting the number of times our mailroom room employees will need to be at our

1 business site during this pandemic

2 4. Due to the Governor's Order and instructions, Heffler is unable to mail the Class
3 Certification Notice on Monday, March 30, 2020. The next date Heffler will be able to mail the Class
4 Certification Notice in this case is Thursday, April 2, 2020.

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6 I hereby declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct. Executed this 25th day of March 2020, in Los Gatos, California.

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11 Mark Rapazzini